

HLJ

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M11-132**

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

CLARENCE FULLER, JR.,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

SHANNON MCFADDEN, being duly sworn, deposes and states that she is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about February 4, 2011, within the Eastern District of New York and elsewhere, defendant CLARENCE FULLER, JR. did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>


1. On or about February 4, 2011, CLARENCE FULLER, JR. arrived at John F. Kennedy International Airport ("JFK Airport") in Queens, New York, aboard Delta Airlines Flight 384 from Georgetown, Guyana.

2. Defendant CLARENCE FULLER, JR. was selected for a Customs and Border Protection ("CBP") inspection. During questioning, the defendant was asked if one grey rolling suitcase and one blue rolling suitcase he was carrying and their contents were his. He responded in the affirmative. During inspection of the grey suitcase, CBP officers discovered that the bottom of the bag was unusually heavy. Further inspection of the bottom of the grey suitcase revealed a white powdery substance inside clear plastic, which field-tested positive for cocaine. Inspection of the blue rolling suitcase also revealed a white powdery substance wrapped in clear plastic concealed within the bag. This white powdery substance also field-tested positive for cocaine. The approximate gross weight of the cocaine recovered from both of the suitcases is 6,358.8 grams.

---

<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that  
defendant CLARENCE FULLER, JR. be dealt with according to law.

  
SHANNON MCPADDEN  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
5th day of February, 2011

---

Y  
DGE  
K